

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN**

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BRIAN BEMKE, SCOTT COLLETT,  
JOHN FERIOZZI, JUDY FINTZ, SARAH  
JAMIESON, EVAN JOHNSON, TRACY  
LONG, and CLIFFORD NEUMANN,

Plaintiffs,  
v.  
Case No. 21-cv-560

AMY PECHACEK, in her official capacity  
as Secretary-designee of the State of Wisconsin  
Department of Workforce Development,

Defendant.

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**PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT**

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PLEASE TAKE NOTICE that the plaintiffs, by and through their undersigned counsel, hereby move the Court for partial summary judgment pursuant to Federal Rule of Civil Procedure 56(a) on Plaintiffs' first claim of discrimination in violation of the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act against Defendant Amy Pechacek. The grounds for this motion are set forth in the accompanying brief and supporting documents.

Defendant is hereby notified that if they do not oppose the moving party's proposed facts that properly rely on evidentiary submissions in the record, the Court will accept the facts as unopposed. Defendant is directed to Fed. R. Civ. P. 56 and the procedures set forth in the Court's Preliminary Pretrial Conference Order governing summary judgment procedure.

Dated this 12th day of August, 2022.

**GINGRAS, THOMSEN & WACHS, LLP**

*/s/ Paul A. Kinne*

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*/s/ Victor Forberger*

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